

Eagle Mine

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www.eaglemine.com

Monday, March 24, 2014

Via PDF (<u>Moody.jonathan@EPA.gov</u>)
Confirmation First Class Mail

U.S. Environmental Protection Agency Attention: Jonathan Moody Water Enforcement & Compliance Assurance Branch Water Division, WC-15J 77 West Jackson Blvd. Chicago, IL 60604-3590

RE: February 2014 Monthly Discharge Report Pursuant to Paragraph 10 of July 2, 2013 Clean Water Act Section 308(a) Request for Information Eagle Mine, LLC, Humboldt Mill Facility Docket No. V-W-13-308-17

Dear Mr. Moody:

In accordance with Region 5 U.S. EPA's Clean Water Act Section 308(a) Information Request dated July 2, 2013 (Request) and subsequent correspondence between Regional Counsel Nicole Cantello and Dennis J. Donohue, Eagle Mine LLC (Eagle) hereby submits this monthly report of discharge of water from the Humboldt Tailings Disposal Facility (HTDF) in partial response to paragraph No. 10 of the Request, for the period from February 1 to February 28, 2014.

The enclosed tabular summary (Table 1) contains dates of water discharge from the HTDF, the total estimated volume of discharge and the peak rate of discharge. Because flow rates are measured or estimated on a daily basis, the peak rate of discharge is presented as a daily maximum flow.

Analytical results from February 20, 2014 sampling of the HTDF discharge are also summarized in Table 1. The February 20, 2014 sampling event represents a dry weather sampling event. A qualifying rainfall event did not occur in February of 2014. The laboratory analytical reports for the HTDF discharge samples, including relevant chain of custody documentation, are presented as Attachment I to this letter.

The HTDF discharge analytical results were compared to Michigan Rule 57 water quality standards and no exceedances of Rule 57 water quality standards were observed in the surface water discharge samples.

Continues Page | 2

Finally, we are also submitting surface water elevation data for the HTDF collected in February of 2014, as requested by Nicole Cantello in her September 3, 2013 electronic correspondence to Dennis Donohue.

Please do not hesitate to contact me with any questions regarding these documents or if you are in need of additional information.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those person(s) directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Kristen A. Mariuzza

Manager, Environment & Permitting

Discharge Date	Estimated Daily Discharge (gal) ¹	Notes
2/1/2014	1,530,000	
2/2/2014	1,521,400	
2/3/2014	1,541,600	
2/4/2014	1,554,000	
2/5/2014	1,554,000	
2/6/2014	1,588,300	
2/7/2014	1,539,600	
2/8/2014	2,232,000	
2/9/2014	2,232,000	
2/10/2014	2,232,000	
2/11/2014	2,232,000	
2/12/2014	2,232,000	
2/13/2014	2,232,000	
2/14/2014	2,232,000	
2/15/2014	2,232,000	
2/16/2014	2,232,000	
2/17/2014	2,232,000	
2/18/2014	2,232,000	
2/19/2014	2,232,000	
2/20/2014	2,232,000	
2/21/2014	2,232,000	
2/22/2014	2,232,000	
2/23/2014	2,232,000	
2/24/2014	2,232,000	
2/25/2014	2,232,000	
2/26/2014	2,232,000	
2/27/2014	2,232,000	
2/28/2014	2,232,000	
Cotal Estimated Monthly Discharge (gal):	57,700,900	
Maximum Estimated Daily Discharge Rate (gal):	2,232,000	

 $^{^{1}\,}$ Discharge rates are estimated based, in part, on pump capacity and pump operating time.

HUMBOLDT TAILINGS DISPOSAL FACILITY STORM WATER DISCHARGE DISCHARGE CHARACTERIZATION DATA

Sample Location		EM-HMP-009
Lab Sample ID	T14B264	
Sampled By	AECOM	
Analyzed By		Trace
Sample Date		2/20/2014
Inorganics	Units	
Antimony	ug/L	4.8
Arsenic	ug/L	<1.0
Barium	ug/L	9.7
Beryllium	ug/L	<1.0
Boron	ug/L	48
Cadmium	ug/L	< 0.20
Chromium, Total	ug/L	<10
Cobalt	ug/L	3.4
Copper	ug/L	4.6
Lead	ug/L	<1.0
Lithium	ug/L	<10
Manganese	ug/L	190
Mercury (Inorganic)	ng/L	0.6
Molybdenum	ug/L	11
Nickel	ug/L	61
Selenium	ug/L	<1.0
Silver	ug/L	< 0.50
Strontium	ug/L	230
Thallium	ug/L	<1.0 J
Zinc	ug/L	<10
Miscellaneous	Units	
Cyanide, total	mg/L	< 0.0050
Fluoride	mg/L	0.21
Nitrogen, Ammonia	mg/L	< 0.010
Phosphorus, Total	mg/L	< 0.010
Sulfate	mg/L	130
Total Dissolved Solids	mg/L	340
Total Suspended Solids	mg/L	<10

Bolded value denotes parameter detected above detection limit

J - The LCS recovery was out of control low. The result and reporting limit for this analyte must be considered estimated.

Supplemental Request N. Cantello September 3, 2013 Correspondence February 2014 Monthly Report

HUMBOLDT TAILINGS DISPOSAL FACILITY ("HTDF") SURFACE WATER ELEVATION DATA

Measurement Date	HTDF Water Elevation (ft AMSL)
2/3/2014	1536.31
2/7/2014	1536.12
2/11/2014	1535.76
2/14/2014	1535.53
2/17/2014	1535.29
2/20/2014	1535.05
2/21/2014	1535.01
2/24/2014	1534.73



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March 14, 2014

Mr. Lance Lindberg AECOM 1050 Wilson Marquette, MI 49855

Phone: (906) 228-2333 Fax: (906) 226-8371

RE: Trace Project T14B264

Client Project Humbolt Mill 60305471

Dear Mr. Lindberg:

Enclosed are your analytical results. The results of this report relate only to the samples listed in the body of this report.

All reports were examined through Trace's validation process to ensure that requirements for quality and completeness were satisfied. All reported analytical results were obtained in accordance with the methods referenced on the reports. Every practical effort was made to meet the reporting limit specifications for this work, however, some results may have raised reporting limits to correct for percent solids.

For clients that require NELAC Accreditation, Trace certifies that these test results meet all requirements of the NELAC Standard, except for those analytes with a "N" notation. These analytes have not been evaluated by NELAC at Trace's discretion and will not be reported unless requested by client.

If you have questions concerning this report, please contact me at 231.773.5998 or by email at jmink@trace-labs.com.

Sincerely,

Jon Mink Senior Project Manager

Enclosures





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SAMPLE SUMMARY

Trace Project ID: T14B264

Client Project ID: Humbolt Mill 60305471

Trace ID	Sample ID	Matrix	Collected By	Date Collected	Date Received
T14B264-01	EM-HMP-009	Aqueous	AJP	02/20/14 14:05	02/21/14 10:40



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AN EXPLANATION OF TERMS AND SYMBOLS WHICH MAY OCCUR IN THIS REPORT

DEFINITIONS

LCS Laboratory Control Sample

LCSD Laboratory Control Sample Duplicate

MS Matrix Spike

MSD Matrix Spike Duplicate
RPD Relative Percent Difference

DUP Matrix Duplicate

RDL Reporting Detection Limit
MCL Maximum Contamination Limit
TIC Tentatively Identified Compound

<, ND or U Indicates the compound was analyzed for but not detected

* Indicates a result that exceeds its associated MCL or Surrogate control limits

N Indicates that the compound has not been evaluated by NELAC

NA Indicates that the compound is not available.

NOTE: Samples for volatiles that have been extracted with a water miscible solvent were corrected for the

total volume of the solvent/water mixture.

DATA QUALIFIERS

Trace ID:	T043392-BLK1	
Silver	:: EPA 200.8 Rev. 5.4	Note 620: A positive result for this analyte was found in the method blank. Because no positive result was found in the sample, no data require qualification.
Trace ID:	T14B264-01 :: SM 4500-H+ B-00	
pH		Note pH: The pH was analyzed at 10:53
Trace ID: Analysis	T14B264-01RE1	

Thallium

Note 105: The LCS recovery was out of control low. The result and reporting limit for this analyte, in this quality control batch, must be considered estimated.



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ANALYTICAL RESULTS

Trace Project ID: T14B264

Client Project ID: Humbolt Mill 60305471

Гrace ID: T14B264-01 Sample ID: EM-HMP-009			Date Collected: Date Received:		02/20/14 14:05 02/21/14 10:40		Matrix: Aqueous		
PARAMETERS	RESULTS UNITS	RDL	DILUTION	PREPARED	BY	ANALYZED	BY	NOTES	MCI
METALS, TOTAL									
Analysis Method: EPA 1631E									
Batch: T043598									
Mercury	0.64 ng/L	0.50	1	03/07/14	rw	03/11/14	klm		
Analysis Method: EPA 200.7 Rev. 4.4									
Batch: T043392									
Boron	48 ug/L	40	1	02/26/14	rlb	02/27/14	dtm		
Lithium	<10 ug/L	10	1	02/26/14	rlb	02/27/14	dtm	N	
Strontium	230 ug/L	50	1	02/26/14	rlb	02/27/14	dtm		
Analysis Method: EPA 200.8 Rev. 5.4									
Batch: T043547									
Antimony	4.8 ug/L	1.0	1	03/06/14	rlb	03/06/14	klm		
Arsenic	<1.0 ug/L	1.0	1	02/26/14	rlb	02/27/14	klm		
Barium	9.7 ug/L	5.0	1	02/26/14	rlb	02/27/14	klm		
Beryllium	<1.0 ug/L	1.0	1	02/26/14	rlb	02/27/14	klm		
Cadmium	<0.20 ug/L	0.20	1	02/26/14	rlb	02/27/14	klm		
Chromium	<10 ug/L	10	1	02/26/14	rlb	02/27/14	klm		
Cobalt	3.4 ug/L	2.0	1	02/26/14	rlb	02/28/14	rw		
Copper	4.6 ug/L	1.0	1	02/26/14	rlb	02/27/14	klm		
Lead	<1.0 ug/L	1.0	1	02/26/14	rlb	02/27/14	klm		
Manganese	190 ug/L	1.0	1	02/26/14	rlb	02/27/14	klm		
Molybdenum	11 ug/L	1.0	1	02/26/14	rlb	02/27/14	klm	N	
Nickel	61 ug/L	5.0	1	02/26/14	rlb	02/27/14	klm		
Selenium	<1.0 ug/L	1.0	1	02/26/14	rlb	02/27/14	klm		
Silver	<0.50 ug/L	0.50	1	02/26/14	rlb	02/27/14	klm		
Thallium	<1.0 ug/L	1.0	1	03/06/14	rlb	03/07/14	ZZZ	105	
Zinc	<10 ug/L	10	1	02/26/14	rlb	02/27/14	klm		

CERTIFICATE OF ANALYSIS

Report ID: T14B264 FINAL 03 14 14 1509 Page 4 of 12



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ANALYTICAL RESULTS

Trace Project ID: T14B264

Client Project ID: Humbolt Mill 60305471

Trace ID: T14B264-01 Sample ID: EM-HMP-009			Collected: Received:	02/20/14 14:05 02/21/14 10:40		Matrix: Aqueous			
PARAMETERS	RESULTS UNITS	RDL	DILUTION	PREPARED	BY	ANALYZED	BY	NOTES	MCI
WET CHEMISTRY									
Analysis Method: ASTM D7511-09e2 Batch: T043327									
Cyanide (total)	<0.0050 mg/L	0.0050	1	02/24/14	sv	02/24/14	sv		
Analysis Method: EPA 300.0 Rev. 2.1 Batch: T043373									
Fluoride	0.21 mg/L	0.10	5	02/25/14	sv	02/25/14	sv		
Sulfate as SO4	130 mg/L	5.0	10	02/25/14	sv	02/25/14	sv		
Analysis Method: EPA 350.1 Rev. 2.0 Batch: T043413 Ammonia as N	<0.010 mg/L	0.010	1	02/27/14	as	02/27/14	as		
Analysis Method: SM 2540 C-97 Batch: T043375									
Total Dissolved Solids	340 mg/L	10	1	02/25/14	sv	02/25/14	sv		
Analysis Method: SM 2540 D-97 Batch: T043318 Total Suspended Solids	<10 mg/L	10	1	02/21/14	sv	02/24/14	as/sv		
Analysis Method: SM 4500-H+ B-00 Batch: T043420									
рН	7.42 pH Units		1	02/20/14	jrw	02/21/14	jrw	рН	
Analysis Method: SM 4500-O C-01 Batch: T043308									
Dissolved Oxygen	12 mg/L	0.080	1	02/21/14	sv	02/21/14	sv	N	
Analysis Method: SM 4500-P E Batch: T043423									
Phosphorus-Total (as P)	<0.010 mg/L	0.010	1	02/27/14	sv	02/28/14	rbp	N	

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QUALITY CONTROL RESULTS

Trace Project ID: T14B264

Client Project ID: Humbolt Mill 60305471

QC Batch: T043598

Analysis Description: Mercury, Total, Low Level

QC Batch Method: EPA 1631E

Analysis Method: EPA 1631E

METHOD BLANK: T043598-BLK1

Parameter	Units	Blank Result	Reporting Limit	Notes
Mercury	ng/L	<0.50	0.50	

LABORATORY CONTROL SAMPLE: T043598-BS1

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limit	Notes
Mercury	na/l	25.0	26.8	107	77-123	

Trace Project ID: T14B264

Client Project ID: Humbolt Mill 60305471

QC Batch: T043392 QC Batch Method: EPA 200.2

Analysis Description: Boron, Total Analysis Method: EPA 200.7 Rev. 4.4

METHOD BLANK: T043392-BLK1

Parameter	Units	Blank Result	Reporting Limit	Notes
Boron	ug/L	<40	40	
Lithium	ug/L	<10	10	
Strontium	ug/L	<50	50	

LABORATORY CONTROL SAMPLE: T043392-BS1

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limit	Notes
Boron	ug/L	1600	1490	93	85-115	
Lithium	ug/L	1600	1470	92	85-115	
Strontium	ug/L	1600	1440	90	85-115	

Trace Project ID: T14B264

Client Project ID: Humbolt Mill 60305471

QC Batch: T043392 Analysis Description: Cadmium, Total QC Batch Method: EPA 200.2 Analysis Method: EPA 200.8 Rev. 5.4

METHOD BLANK: T043392-BLK1

Parameter	Units	Blank Result	Reporting Limit	Notes
Silver	ug/L	<0.50	0.50	620
Arsenic	ug/L	<1.0	1.0	

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METHOD BLANK: T043392-BLK1

Parameter	Units	Blank Result	Reporting Limit	Notes
Barium	ug/L	<5.0	5.0	
Beryllium	ug/L	<1.0	1.0	
Cadmium	ug/L	<0.20	0.20	
Cobalt	ug/L	<2.0	2.0	
Chromium	ug/L	<10	10	
Copper	ug/L	<1.0	1.0	
Manganese	ug/L	<1.0	1.0	
Molybdenum	ug/L	<1.0	1.0	
Nickel	ug/L	<5.0	5.0	
Lead	ug/L	<0.40	0.40	
Antimony	ug/L	<1.0	1.0	
Selenium	ug/L	<1.0	1.0	
Thallium	ug/L	<1.0	1.0	
Zinc	ug/L	<4.0	4.0	

LABORATORY CONTROL SAMPLE: T043392-BS1

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limit	Notes
Silver	ug/L	50.0	46.3	93	85-115	
Arsenic	ug/L	100	100	100	85-115	
Barium	ug/L	1600	1620	101	85-115	
Beryllium	ug/L	200	193	96	85-115	
Cadmium	ug/L	50.0	49.9	100	85-115	
Cobalt	ug/L	1600	1640	102	85-115	
Chromium	ug/L	50.0	51.3	103	85-115	
Copper	ug/L	1600	1620	101	85-115	
Manganese	ug/L	1600	1530	96	85-115	
Molybdenum	ug/L	1600	1560	98	85-115	
Nickel	ug/L	1600	1610	100	85-115	
Lead	ug/L	100	102	102	85-115	
Antimony	ug/L	100	122	122	85-115	
Selenium	ug/L	100	97.3	97	85-115	
Thallium	ug/L	100	81.5	81	85-115	
Zinc	ug/L	1600	1590	99	85-115	

Trace Project ID: T14B264

Client Project ID: Humbolt Mill 60305471

QC Batch: T043547 QC Batch Method: EPA 200.2 Analysis Description: Antimony, Total Analysis Method: EPA 200.8 Rev. 5.4

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METHOD BLANK: T043547-I	BL⊦	< 1
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Parameter	Units	Blank Result	Reporting Limit	Notes
Antimony	ug/L	<1.0	1.0	
Thallium	ug/L	<1.0	1.0	

LABORATORY CONTROL SAMPLE: T043547-BS1

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limit	Notes
Antimony	ug/L	100	97.7	98	85-115	
Thallium	ug/L	100	82.0	82	85-115	

Trace Project ID: T14B264

Client Project ID: Humbolt Mill 60305471

QC Batch: T043327	Analysis Description: Cyanide, Total
QC Batch Method: ASTM D7511-09e2	Analysis Method: ASTM D7511-09e2

METHOD BLANK: T043327-BLK1

Parameter	Units	Blank Result	Reporting Limit	Notes
Cyanide (total)	mg/L	<0.0050	0.0050	

LABORATORY CONTROL SAMPLE: T043327-BS1

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limit	Notes
Cyanide (total)	mg/L	0.100	0.102	102	90-110	

Trace Project ID: T14B264

Client Project ID: Humbolt Mill 60305471

QC Batch: T043373	Analysis Description: Fluoride
QC Batch Method: IC Prep W	Analysis Method: EPA 300.0 Rev. 2.1

METHOD BLANK: T043373-BLK1

Parameter	Units	Blank Result	Reporting Limit	Notes
Fluoride	mg/L	<0.10	0.10	
Sulfate as SO4	mg/L	<2.5	2.5	

LABORATORY CONTROL SAMPLE: T043373-BS1

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limit	Notes
Fluoride	mg/L	0.500	0.452	90	90-110	
Sulfate as SO4	ma/l	2.50	2 44	98	90-110	

Trace Project ID: T14B264

Client Project ID: Humbolt Mill 60305471

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QC Batch: T043413

QC Batch Method: EPA 350.1 Rev. 2.0

Analysis Description: Nitrogen, Ammonia Analysis Method: EPA 350.1 Rev. 2.0

METHOD BLANK: T043413-BLK1

Parameter Units Blank Reporting Limit Notes

Ammonia as N mg/L <0.010 0.010

LABORATORY CONTROL SAMPLE: T043413-BS1

Spike LCS LCS % Rec Parameter % Rec Conc. Result Notes Units Limit Ammonia as N mg/L 0.500 0.493 99 90-110

Trace Project ID: T14B264

Client Project ID: Humbolt Mill 60305471

QC Batch: T043375

QC Batch Method: SM 2540 C-97

Analysis Description: Total Dissolved Solids

Analysis Method: SM 2540 C-97

METHOD BLANK: T043375-BLK1

Parameter Units Blank Reporting Limit Notes

Total Dissolved Solids mg/L <10 10

LABORATORY CONTROL SAMPLE: T043375-BS1

LCS LCS Spike % Rec Parameter Units Conc. Result % Rec Notes Limit Total Dissolved Solids mg/L 500 517 103 80-120

Trace Project ID: T14B264

Client Project ID: Humbolt Mill 60305471

QC Batch: T043318

QC Batch Method: SM 2540 D-97

Analysis Description: Total Suspended Solids

Analysis Method: SM 2540 D-97

METHOD BLANK: T043318-BLK1

Parameter Units Blank Reporting Limit Notes

Total Suspended Solids mg/L <10 10

LABORATORY CONTROL SAMPLE: T043318-BS1

Spike LCS LCS % Rec Parameter Conc. % Rec Units Result Notes Limit Total Suspended Solids mg/L 50.0 46.0 92 85-115

Trace Project ID: T14B264

Client Project ID: Humbolt Mill 60305471

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Analysis Description: pH, SM 4500

QC Batch: T043420

QC Batch Method: *** DEFAULT PREP *** Analysis Method: SM 4500-H+ B-00

Trace Project ID: T14B264

Client Project ID: Humbolt Mill 60305471

QC Batch: T043308 Analysis Description: Dissolved Oxygen QC Batch Method: SM 4500-O C-01 Analysis Method: SM 4500-O C-01

Trace Project ID: T14B264

Client Project ID: Humbolt Mill 60305471

QC Batch: T043423 Analysis Description: Total Phosphorus

QC Batch Method: SM 4500-P E Analysis Method: SM 4500-P E

METHOD BLANK: T043423-BLK1

Parameter	Units	Blank Result	Reporting Limit	Notes
Phosphorus-Total (as P)	mg/L	<0.010	0.010	

LABORATORY CONTROL SAMPLE: T043423-BS1

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limit	Notes
Phosphorus-Total (as P)	ma/L	0.100	0.0957	96	85-116	

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n ex	ecutin	g this Chain	of Custo	dy, the client	acknowledges	acceptance of	the term	s an	d co	nditi	ons of	the a	agree	ment	as se	t fort	n at h	ttp://	www.ti	race-lab	s.com	/cocterr	ns.phi



phone 231.773.5998 toll-free 800.733.5998 231.773.6537

Trace Analytical Laboratories, Inc. 2241 Black Creek Road Muskegon, MI 49444-2673 info@trace-labs.com www.trace-labs.com

SAMPLE LOG IN CHECKLIST

Trace ID#: 7148264 Date: 2/21/14 Package Desc	cription: Coulin							
Client Name: ALCOM Time: 10', 40	Logged in by:							
Cooler Receipt								
Cooler/samples delivered by: Trace courier								
Hand delivered Name of delivered	very person:							
	ED EX US Mail							
Tracking Number: Not Applicable								
Tracking #: 12 RA 1 03	4 01 9718 3153							
COC Seals present and intact on cooler? No Not Applicable								
Yes 🔀								
Custody seals signed by Client? No Client custody seal # (if app	olicable):							
Yes	**************************************							
Coolant and Temperature								
5.7	cooler Temperature							
	ermometer_O, C_°C							
	al Stick Thermometer <u>~O. /</u> °C							
	C (Use Digital Stick Thermometer)							
Ice Packs/ Blue Ice : Range of 3 samples: 4,2	-5, /_ °C (Use IR Thermometer)							
No Coolant Present: Melt Water:	C (IR or Stick Therm circle one)							
Ice still present upon receipt:	Yes No							
General								
Yes No NA All bottles arrived unbroken with labels in good condition?	Comments							
Each sample point is in a sealed plastic bag?								
Labels filled out completely?	31							
All bottle labels agree with Chain of Custody (COC)?								
Sufficient sample to run tests requested?								
pH checked and samples at correct pH? See Below	r							
Correct preservative added to samples?								
Air bubbles absent from VOAs?								
COC filled out properly and signed by client?								
COC signed in by TRACE sample custodian?	· · · · · · · · · · · · · · · · · · ·							
Was project manager called and samples discussed?								
N-1								
Notes:	*EMD pH Test Strips Used:							
· · · · · · · · · · · · · · · · · · ·	- № PH 0-2.5 Lot: 1HC376384							
	Dother: ME16N							
Form 70-A.10 Effective 8/26/13	TRACE Analytical Laboratories, Inc.							